

CR 22-219 JNE
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UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

SEP 07 2022

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEXANDER MACKENZIE MILLER,

Defendant.

CLERK
U.S. DISTRICT COURT
INFORMATION MINNEAPOLIS, MINNESOTA

18 U.S.C. § 2252(a)(4)(B)
18 U.S.C. § 2252(b)(2)
18 U.S.C. § 2253(a)

THE UNITED STATES ATTORNEY CHARGES THAT:

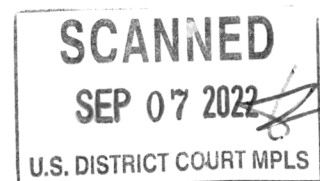
COUNT 1

(Access With Intent To View Child Pornography)

From on or about October 25, 2017, through on or about June 7, 2022, in the State and District of Minnesota, the defendant,

ALEXANDER MACKENZIE MILLER,

having been previously convicted under the laws of the State of Pennsylvania relating to the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography, namely a conviction on or about October 4, 2013, in York County, Pennsylvania for a violation of Pennsylvania Crimes Code, that is the viewing or possession of child pornography, did knowingly access with intent to view one or more matters which contained visual depictions that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, by any means including by computer, where the production of such visual depictions involved the use of a minor engaging in sexually



explicit conduct and such visual depictions were of such conduct, including, but not limited to, the following computer video file:

File Name	Description
pthcXXXXXXXXXXXXX ridesondick-9yofuckslike apro.avi	A one minute and 43 second video that shows a nude prepubescent girl, wearing a black mask, sitting on the hips of a nude adult male. The adult male appears to vaginally penetrate the child with his penis.

all in violation of Title 18, United States Code, Section 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATIONS

Count 1 of this Information is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253(a).

As a result of the foregoing offense, the defendant,

ALEXANDER MACKENZIE MILLER,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253(a):

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110 of Title 18, United States Code;

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, including but not limited to a:

- a. Lenovo Legion laptop, Model 81SX, S/N PF2H9Q0P, which contains a 512GB Western Digital hard drive bearing S/N 201235801467;
- b. Samsung Galaxy cellphone, Model SM-N970U1, S/N R58M82B6YYN, which contains a Verizon Wireless SIM card bearing ICCID 891448000002057074434;
- c. Motorola Droid cellphone, Model XT-1650-02, IMEI 354108070872307;
- d. Verizon Wireless tablet, Model Ellipsis QTASUN1, IMEI 358701072463566, which contains a Verizon SIM card bearing ICCID 89148000003068349104; and
- e. Desktop computer bearing S/N 17518489728, which contains a 256 SanDisk SSD bearing S/N 152891400131, and a 1TB Inland Professional SSD bearing S/N 19022210240004.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2), and 2253(a).

Date: August 25, 2022

ANDREW M. LUGER
United States Attorney

s/ Evan B. Gilead
BY: EVAN B. GILEAD
Assistant United States Attorney
Attorney ID No. 95971 (FL)